

STATEMENT OF BASIS (AI No. 19962)

for draft Louisiana Pollutant Discharge Elimination System permit No. **LA0070637** to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Turn Services, Inc.
Waggaman Cleaning Facility
2200 Royal Street
New Orleans, LA 70117

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Lisa Kemp

DATE PREPARED: June 14, 2007; updated July 9, 2007

1. PERMIT STATUS**A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permit - LPDES permit LA0070637 effective date: November 1, 2002
LPDES permit LA0070637 expiration date: October 31, 2007

The following modifications have been made during this permit term:

1. This permit was modified effective April 1, 2003 to reflect a change in name and ownership from Azaela Fleet, Inc. to AEP Elmwood, LLC
2. This permit was modified effective May 1, 2004 to correct an error/omission made on modified LPDES permit LA0070637, issued to AEP Elmwood, LLC effective April 1, 2003. To clarify the physical location of the facility, the facility location was changed from 222 Bayou Road in Belle Chasse to River Mile 112.3 M.A.H.P. on the West Bank at Live Oak Manor, Jefferson Parish.
3. This permit was modified effective March 1, 2005 to amend the dry commodity barge washwater list for Outfall 001 and to incorporate the facility name, Waggaman Cleaning Facility, in the mailing address.
4. This permit was modified effective February 7, 2006 to reflect a change in name and ownership from AEP Elmwood, LLC to Azalea Fleet, Inc.
5. This permit was modified effective November 6, 2006 to reflect a change in name and ownership from Azalea Fleet, Inc. to Turn Services, Inc.

EPA has not retained enforcement authority.

LPDES permit - LPDES permit LAR05N768 effective date: October 5, 2006
LPDES permit LAR05N768 termination date: January 22, 2007

C. Date Application Received: April 23, 2007; additional information received via telephone on June 13, 2007 and July 9, 2007

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2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - barge cleaning and repair facility

According to the application, Waggaman Cleaning Facility is an existing barge cleaning (70%) and repair (30%) facility. The barges are open top, dry cargo hopper barges. After unloading of product at area facilities, the transportation barges are swept and the dust and small amounts of particles remaining in the barges are removed by washing with water taken directly from the Mississippi River by means of 2" to 3" pumps. The water containing the residual dust and particles is subsequently pumped back into the river at the point of intake. See Attachment I for the list of commodities handled at the facility. A dry dock is used to raise dry cargo barges for topside repairs, repair of leaks, and sandblasting of repaired areas.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II as per LAC33:IX.1319 Table I and SIC 4463*.
3. Wastewater Type: II
4. SIC code: 4491*, 4499, and 3731

* In Appendix A - Section IV (Relation of 1987 to 1977 Industries) of the Standard Industrial Classification Manual, the SIC code 4491 is equivalent to a previous SIC code of 4463

B. LOCATION – 9600 River Road, River Mile 112.3 M.A.H.P. on the West Bank near Live Oak Manor, in Jefferson Parish
 Latitude 30° 02' 43", Longitude 90° 32' 49"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: dry commodity barge washwater from hopper barges
 Treatment: none
 Location: at the point of discharge from the barge being washed
 Flow: intermittent
 Discharge Route: to the Mississippi River

Outfall 002

Discharge Type: coal and coke barge washwater from hopper barges
 Treatment: none
 Location: at the point of discharge from the barge being washed
 Flow: intermittent
 Discharge Route: to the Mississippi River

Outfall 03A

Discharge Type: incoming ballast and void water from customer barges
 Treatment: none
 Location: at the point of discharge from the customer barge wing/void tanks
 Flow: intermittent
 Discharge Route: to the Mississippi River

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Outfall 03B

Discharge Type: maintenance and/or dry dock ballast water
 Treatment: none
 Location: at the point of discharge from the work barge, wing/void tanks, or dry dock
 Flow: intermittent
 Discharge Route: to the Mississippi River

Outfall 004

Discharge Type: treated sanitary wastewater
 Treatment: sanitary treatment package unit
 Location: at the point of discharge from package unit
 Flow: 500 gpd
 Discharge Route: to the Mississippi River

Other Discharges – Stormwater runoff will be covered by Barge Best Management Practices.

4. RECEIVING WATERS

STREAM - the Mississippi River

BASIN AND SEGMENT - Mississippi River Basin, Segment 070301

DESIGNATED USES - a. primary contact recreation
 b. secondary contact recreation
 c. propagation of fish and wildlife
 d. drinking water supply

5. TMDL STATUS

The discharges from Turn Services, Inc., Waggaman Cleaning Facility, are to the Mississippi River, Subsegment 070301 of the Mississippi River Basin. Subsegment 070301 is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale, Page 7.

Summary of proposed changes from the current LPDES permit:

1. Barge repairs are now included as part of the facility operations.
2. Dry dock ballast water has been added to discharge description for Outfall 03B. Best Management Practices for dry docks have been included in Part II of the permit.
3. Barge/vessel sandblasting or abrasive blasting Best Management Practices have been included in Part II of the permit.
4. The Part II requirement for a Stormwater Pollution Prevention Plan (SWPPP) has been removed since this is now a water related operation only. According to Mr. Richard Wright, representing Turn Services, Inc., Turn Services does not have any land-based operations at this site.

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7. COMPLIANCE HISTORY/COMMENTS

1. WQMD – There are no open, appealed, or pending OEC enforcement actions as of June 12, 2007.
2. DMR Review/Excursions – LPDES Permit LA0070637 was transferred to Turn Services, Inc. effective November 6, 2006. DMRs on file for December, 2006 reported no discharge for Outfalls 001 -003. Outfall 004 was not sampled.

8. EXISTING EFFLUENT LIMITS

Outfall 001 – dry commodity barge washwater

No effluent limits are established for washwaters from dry commodity barges. Best Management Practices for barge operations are included in the permit.

Outfall 002 – coal and coke barge washwater

POLLUTANT	LIMITATION Units (Specify)		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow (MGD)	Report	Report	1/week	Estimate
COD	250 mg/L	400 mg/L	1/week	Grab
TSS	Report	Report	1/month	Grab
pH –Allowable Range (standard units) ²	6.0 Minimum	9.0 Maximum	1/week	Grab

Outfall 03A – incoming ballast water from customer barges

Outfall 03B – maintenance ballast water

POLLUTANT	LIMITATION Units (Specify)		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow (MGD)	Report	Report	1/week (*1)	Estimate
COD	---	250 mg/L	1/week (*1)	Grab
Oil & Grease	---	15 mg/L	1/week (*1)	Grab
pH –Allowable Range (standard units) ²	6.0 Minimum	9.0 Maximum	1/week (*1)	Grab

(*1) Measurement frequency for outfall 03B for the discharge of maintenance ballast water shall be 1/month whenever sampling is required.

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Outfall 004 – treated sanitary wastewater

POLLUTANT	LIMITATION Units (Specify)		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	WEEKLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow (MGD)	---	Report	1/6 months	Estimate
BOD ₅	---	45 mg/L	1/6 months	Grab
TSS	---	45 mg/L	1/6 months	Grab
Fecal Coliform	---	400 col/100 ml	1/6 months	
pH –Allowable Range (standard units) ²	6.0 Minimum	9.0 Maximum	1/6 months	Grab

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon and migratory waterfowl, which are listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon and migratory waterfowl. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

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Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for Turn Services, Inc.

1. **Outfall 001:** dry commodity barge washwater from hopper barges

Based on BPJ and on permits for similar facilities, no effluent limitations are established for washwaters from barges previously containing dry commodities including: see Attachment 1. Best Management Practices (BMPs) for barge operations are listed in Part II.

2. **Outfall 002:** coal and coke barge washwater from hopper barges

<u>Pollutant</u>	<u>Limitation</u> Mthly Avg:Daily Max (mg/l)	<u>Reference</u>
Flow-MGD	Report:Report	LAC 33:IX.2701.1.1.b
COD	250:400	Previous Permit; *
TSS	Report:Report	Previous Permit; *
pH	6.0 - 9.0 s.u.	Previous Permit; *

Treatment: none

Monitoring Frequency: TSS shall be observed once per month and Flow, COD and pH shall be observed once per week at the point of discharge from the barge being washed.

Limits Justification: Limits are based on the previous permit and on LDEQ Office practices for permitting coal and/or coke barge washwater.

su Standard Units

* LDEQ Office practices for permitting coal and/or coke barge washwater.

3. **Outfall 03A:** incoming ballast and void water from customer barges **Outfall 03B:** maintenance and dry dock ballast water

<u>Pollutant</u>	<u>Limitation</u> Mthly Avg:Daily Max (mg/l)	<u>Reference</u>
Flow-MGD	Report:Report	LAC 33:IX.2701.1.1.b
COD	---:250	Previous Permit; *
Oil and Grease	---:15	Previous Permit; *
pH	6.0 - 9.0 s.u.	Previous Permit; *

Treatment: none

Monitoring Frequencies:

Outfall 03A - 1/week at the point of discharge from the incoming customer barge/vessel.

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Outfall 03B – Maintenance/dry dock ballast water may be discharged without sampling provided there is no visible oil sheen. Flow and the presence or absence of a sheen shall be recorded for all discharges. The measurement frequency for maintenance/dry dock ballast water shall be 1/month whenever sampling is required.

Limits Justification: Limits and monitoring frequency are based on the previous permit and on LDEQ Office practices for permitting ballast wastewater.

su Standard Units

* LDEQ Office practices for permitting ballast wastewater

4. **Outfall 004:** treated sanitary wastewater

<u>Pollutant</u>	<u>Limitation</u> Mthly Avg; Weekly Avg (mg/l)	<u>Reference</u>
Flow (gpd)	---:Report	LAC 33:IX.2701.I.1.b
BOD ₅	---:45	LAG530000; previous permit
TSS	---:45	LAG530000; previous permit
Fecal Coliform (col/100ml)	---:400	LAG530000; previous permit
pH (allowable range)	6.0 - 9.0s.u.	LAG530000; previous permit

Treatment: sanitary treatment package unit

Monitoring Frequency: 1/6 months

Limits Justification: Limits and Monitoring Frequency are based on the Class I Sanitary Discharge General Permit, LAG530000 and the previous permit

This facility is not subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, because, in accordance with 40 CFR 442.1.a, "this part applies to discharges resulting from cleaning the interior of tanks used to transport chemical, petroleum or food grade cargos." This facility does not clean tanks. Only open top dry cargo hopper barges are cleaned.

Storm Water Pollution Prevention Plan (SWP3) Requirement

As per LAC33:IX.2511.B.14.a-k, stormwater discharges from facilities classified as SIC Codes 3731 and 4491 are considered to be associated with industrial activities and accordingly require SWP3 requirements. However, an SWP3 is not included in the permit because the facility is a water related operation only. Barge BMPs are comparable to the SWP3 requirements; therefore, the barge BMPs will be applied instead.